

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

JoAnne Rau
Director, Environment and Safety Mgmt
The Dayton Power and Light Co.
1065 Woodman Drive
Dayton, Ohio 45432

ATTENTION:

JoAnne Rau, Director of Environment and Safety Management

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Dayton Power and Light (DP&L or you) to submit certain information about its Killen Station located near Manchester, Ohio and Stuart Station located near Aberdeen, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that DP&L must submit. DP&L must send this information to EPA within forty-five (45) calendar days after receipt of this request, unless otherwise specified.

EPA is issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

EPA believes that DP&L may have information necessary for the purposes set forth in Section 114(a) of the CAA. EPA is requesting this information to determine whether your emission source is complying with the CAA.

DP&L must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

DP&L must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

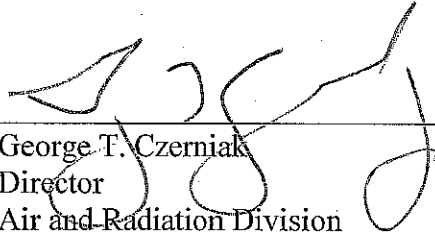
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

EPA may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject DP&L to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Ethan Chatfield at (312) 886-5112.

10/13/14
Date


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The term “relate to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term “DP&L” shall mean Dayton Power and Light, and all subsidiaries and related entities.

Appendix B

Information You Are Required to Submit to EPA

Provide the below information for each coal-fired unit at the Killen and Stuart Stations using the instructions and definitions provided in Appendix A. If possible, EPA requests that all information be provided in electronic (.pdf or .xls) format.

1. For each coal-fired unit at the Killen and Stuart Station provide a chart containing the following information:
 - a) the emission unit identification number;
 - b) any scheduled or planned unit retirement dates;
 - c) the original design and current gross and net capacity (MWg/MWn);
 - d) the original design and current maximum heat input capacity (mmBtu/hr);
 - e) type of particulate emissions control (manufacturer and design), date commenced operation, and design outlet emission rate and removal efficiency specification and guarantees;
 - f) type of sulfur dioxide emissions control (manufacturer and design), date commenced operation, and design outlet emission rate and removal efficiency specification and guarantees;
 - g) type of nitrogen oxides emissions control (manufacturer and design), date commenced operation, and design outlet emission rate and removal efficiency specification and guarantees;
 - h) type of sulfuric acid emissions control (manufacturer and design), date commenced operation (or projected to commence), and design outlet emission rate and removal efficiency specification and guarantees; and
 - i) Any planned particulate, sulfur dioxide, nitrogen oxides, acid gas, or sulfuric acid mist emission controls.
2. Provide a diagram of the orientation of the flues (and corresponding units) in the main scrubber stack at the Stuart Station in relation to the plant layout. Denote which flues/units were operating on September 30, 2014 from 1pm to 4pm.
3. Provide a list of all capital projects of an amount greater than \$100,000 approved or completed between January 1, 2005 and the date of this request for the Killen Station. For each such capital project, identify the work performed, the date completed or projected to be completed, the project work order number and the dollar amount approved and/or expended.
4. Provide the following information requested in a) through o) for the outage at Killen Unit 2 that occurred between approximately February 2013 through April 2013:
 - a) exact out-of-service and in-service dates (month/day/year) for the listed outage;
 - b) total cost of the outage and a list of all expenses related to the outage;
 - c) all associated project authorization requests with authorized expenditure, authorizing signatures, approval dates, and any associated attachments, addendums or supporting

- documentation;
 - d) all work orders, including work order approvals with authorizing signatures;
 - e) work order project completion reports;
 - f) any outage reports detailing all work completed during the time of the outage;
 - g) project justifications/benefits [including any presentations made to staff, management or Board, or outside approval organizations (e.g. public utilities commission)];
 - h) cost/benefit analyses;
 - i) alternative options analyses;
 - j) estimated date(s) that components were previously replaced;
 - k) all correspondence with the State or regulatory agency regarding the potential applicability or exemption of any provision of the Clean Air Act;
 - l) copies of all emission calculations (in Excel compatible format, if available) performed in conjunction with the outage, including calculations performed before the project was commenced and after the project was completed, as well as any determination(s) that no emission calculations were necessary;
 - m) all documents providing or discussing the prior frequency, duration or extent of outages related to the components being replaced during the outage;
 - n) copies of all documents describing whether the project was associated with a life extension project, capacity increase, efficiency enhancement, or reliability improvement; and
 - o) all documents describing the purpose or goals of any components being replaced.
5. Provide an electronic (Excel compatible) copy of all Generating Availability Data System (GADS) data, or outage reports (if GADS data is not collected) for the Killen and Stuart Station from January 1, 2000 to the date of this request.
 6. Provide an electronic (Excel compatible) copy of all continuous opacity monitor system (COMS) data (6-minute averages) that exceeds the 20 percent opacity requirement for all coal fired units at the Killen and Stuart Station from January 1, 2010 to the date of this request. COMS data should include percent opacity, date and time, a reason/action code with description, and any corrective actions taken for each 6-minute average opacity exceedance period. Any 20 percent opacity, 6-minute average that DP&L believes is exempt should be noted or marked and a reason for any exemption provided with supporting data. Providing copies of the Quarterly Deviation and Compliance Monitoring/Opacity Exceedance Events Reports is not sufficient in responding to this request. Do not provide all COMS data during this period (i.e. too much data), but only the 6-minute average data that exceeds the 20 percent opacity in the applicable standard.
 7. Provide copies of all visible emission observations (i.e. EPA Method 9 readings) completed at the Killen and Stuart Station from January 1, 2010 to the date of this request.
 8. Provide copies of the summary results page of any and all stack tests completed at the Killen and Stuart Station for particulate matter (PM, PM₁₀, PM_{2.5}), sulfuric acid mist (H₂SO₄ or SO₃), acid gases, and mercury from January 1, 2010 to the date of this request.

9. Provide a detailed description of all additives, techniques, controls, process changes, or other measures that are or have ever been employed to reduce the emissions of SO_3 or H_2SO_4 from each coal fired unit at the Killen and Stuart Station. If applicable, this description shall include, but not be limited to, the rate at which any material (i.e. sorbent) has been/or is being injected, the specific chemical composition of the material, the location of material injection ports, a description of the injection ports, and the dates each emission control technique has been (or is planning to be) employed at each unit.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

JoAnne Rau
Director, Environment and Safety Mgmt
The Dayton Power and Light Co.
1065 Woodman Drive
Dayton, Ohio 45432

Jim Stice
Environmental Manager
Killen Generating Station
14869 U.S. Route 52
Manchester, Ohio 45144


7011 1150 0000 2639 2895

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
1800 WaterMark Drive
Columbus, Ohio 43215

Mike Kramer
Permits and Enforcement Section
Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio, 45219-2660

On the 14 day of October 2014.



Loretta Shaffer
Administrative Professional Assistant
Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 7011 1150 0000 2639 2918